

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TERRELL JONES,)	
)	
Plaintiff,)	08 C 586
)	
vs.)	Honorable Judge
)	William T. Hart
CARLOS ALTEZ,)	
SALVADOR GODINEZ)	
)	
Defendants.)	

DEFENDANTS' MOTION TO DEPOSE INCARCERATED PERSON

NOW COMES the Defendants, CARLOS ALTEZ and SALVADOR GODINEZ, by their attorney, RICAHRD A. DEVINE, Cook County State's Attorney, and through his Assistant, KEVIN FREY and pursuant to Rule 30(a)(2) of the Federal Rule of Civil Procedure, moves this Honorable Court to take the deposition of Terrell Jones. In support, Defendants state as follows:

1. That Terrell Jones is the Plaintiff in the present action.
2. That the Defendants intend to take the deposition of Terrell Jones.
3. That Terrell Jones is presently incarcerated at the Cook County Jail, located at 2600 South California, Chicago, Illinois 60608.

WHEREFORE, Defendants respectfully request this Honorable Court allow the deposition of the Plaintiff, Terrell Jones.

Respectfully Submitted,

RICHARD A. DEVINE
State's Attorney of Cook County

By: /s/Kevin Frey
Kevin Frey
Assistant State's Attorney
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